

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE TESTOSTERONE REPLACEMENT THERAPY
PRODUCTS LIABILITY LITIGATION COORDINATED
PRETRIAL PROCEEDINGS

No. 14 C 1748
MDL No. 2545

This document applies to:
All Cases

**PLAINTIFFS' EXECUTIVE COMMITTEE'S MOTION TO COMPEL PRODUCTION OF
ANALYTIC DATA AND/OR PRODUCTION OF DOCUMENTS RETURNED BY
PLAINTIFFS' PROPOSED SEARCH TERMS**

Plaintiffs' Executive Committee ("PEC") hereby moves pursuant to Rules 26 and 37 of the Federal Rules of Civil Procedure for an order (a) compelling Defendants AbbVie Inc. and Abbott Laboratories, Inc. (together "AbbVie") to produce to the PEC hit counts and responsiveness analytics with respect to Plaintiffs' December 22, 2014 proposal; to negotiate with Plaintiffs in good faith based on the results of such analytics; and to perform, and provide to Plaintiffs, such follow-up analytics as may be necessary in the course of the parties' negotiation of a search protocol; or (b) in the alternative, compelling AbbVie to use Plaintiffs' February 2, 2015 proposed search protocol for the production of certain electronically-stored information.

The grounds for this Motion are set forth in the PEC's Memorandum of Law in Support of Motion to Compel Production of Analytic Data and/or Production of Documents Returned By Plaintiffs' Proposed Search Terms, filed contemporaneously herewith.

Dated: February 13, 2014

Respectfully submitted,

/s/ Trent B. Miracle

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CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2015, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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